

.....ComprehensivePlan
for the National Capital

Preservation and Historic Features

element

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Introduction

PRESERVATION AND HISTORIC FEATURES

It is the goal of the federal government to:

Preserve and enhance the image and identity of the Nation’s Capital and region through design and development respectful of the guiding principles of the L’Enfant and McMillan Plans, the enduring value of historic buildings and places, and the symbolic character of the capital’s setting.

Washington’s unique character rests on the foundation of its historic planning, notably the built and open space features of the L’Enfant Plan and the public and private buildings that were designed and located to reinforce the Plan’s principles. Washington’s historic properties typically contribute to and complement the visionary long-range plans that have provided the basis for the capital’s development over the centuries. More so than in most American cities, an adherence to high standards of urban design and historic preservation has created the appearance and character of the national capital that we admire today

The federal government has, from its inception, implemented L’Enfant’s bold but flexible vision by constructing great buildings to house the seat of the national government. As the federal government built out the sites identified in the L’Enfant Plan, it has added extensive facilities in other parts of the city and to region. Growth and change have been spurred through the centuries by many factors: national events such as the Civil War, the New Deal, and World War II; planning initiatives such as the McMillan Plan; and technological and transportation advances such as Metrorail. Federal buildings and sites illustrate the planning and architectural development of the city and region as well as the history of the federal establishment. Landmarks such as the U.S. Capitol, the

White House, the National Mall and its memorials and museums, and Arlington National Cemetery have come to symbolize the nation itself.

Although the predominantly federal Monumental Core may be Washington’s most widely recognized area, the capital city is at the same time an active commercial and residential city with neighborhoods, parks, and buildings that are important to Washingtonians and their sense of history and community. Even in these non-federal areas, the federal government has played a major role in shaping the historic urban fabric. Much of this rich historical planning record is evident in the city’s architecture, as well.

The L’Enfant Plan’s streets and places, and their extension by the 1893 Permanent System of Highways Act, as well as the 1901 McMillan Plan and the 1910 Height of Buildings Act, have directed the character and orderly development of the entire city.

THE VALUE OF PLANNING HAS NOWHERE BEEN SO CLEARLY DEMONSTRATED AS IN THE DEVELOPMENT OF THE CITY OF WASHINGTON, FOR THE MAGNIFICENCE OF OUR NATIONAL CAPITAL TODAY IS IN LARGE PART THE HERITAGE OF THE STRONG AND ENDURING PLAN LAID DOWN BY MAJOR PIERRE L’ENFANT IN 1791. WORTHY OF THE NATION, NCPC, 1977

Anacostia Historic District



A wide range of historic features—buildings, structures, historic districts, and landscapes, in public and private ownership—conveys the rich history and character of the region.

Governors' Bridge, Patuxent River



Riversdale, Prince George's County, MD



National Defense University, Ft. McNair



Alexandria Historic District (Old and Historic District) Alexandria, VA

At a regional scale, the Washington area developed historically with large plantations and small family farms, dotted with crossroads and market towns, a pattern that was initially little changed by the creation of the capital city. Notable port towns and later military forts overlooked the Potomac River and the capital city. Settlements and commercial centers, many quite independent of the presence of the national capital, arose along the great variety of transportation routes typical of the mid-Atlantic region.

The federal government, over time, shaped the development and character of the region as a whole. The nineteenth-century construction of military and naval installations, during times of war as well as peace, were followed in the twentieth century by the expansion of federal offices and research facilities. The National Institutes of Health, the Beltsville Agricultural Research Center, Suitland Federal Center, the Pentagon, and Dulles Airport (all include or are historic properties) are but some of the federal facilities that have greatly influenced the private development of the region. The purchase of parkland in Maryland by the National Capital Planning Commission through the Capper-Cramton Act and the construction of parkways are other examples of federal land-use decision-making that has shaped the region.

In recognition of this history, the region's municipal and county governments have protected historic resources they deem important for local or, indeed, state and national historical significance. Alexandria, in 1946, created one of the first historic districts in the nation in order to preserve the colonial and early federal character of its port city. The U.S. Congress designated the Georgetown Historic District in the Old Georgetown Act in 1950. The Joint Committee Landmarks published the District's first list of historic properties in 1964. In 1966, the National Historic Preservation Act was passed, adding to the establishment of national standards and procedures for the protection of historic properties. Since home rule in 1973 and the D.C. Historic Preservation Act of 1978, the District of Columbia government has identified and protected private properties of local significance throughout the District. Local jurisdictions in Virginia and Maryland, also in response to the growing historic preservation interest at the national, state, and local levels, established ordinances for the protection of their historic properties. These ordinances and programs have contributed to the protection of individual buildings and their settings, open space, farms, historic neighborhoods, and commercial centers, even in an era of sustained growth in the National Capital Region.

When local governments plan for large-scale redevelopment, residential growth, and transportation

Historic Preservation Challenges for Federal Agencies

networks, they manage proposed changes in the vicinity of historic properties, taking into account the setting and character of those properties. The thousands of designated historic properties throughout the National Capital Region reflect the rich and varied history of this area and its people. Most of these properties are local landmarks, but many are also listed in the National Register of Historic Places, a federal register of historic properties maintained by the National Park Service that affords protection when federal projects or money are involved. The federal government now regularly works with state and local governments in the identification and protection of historic properties.

The public charge for federal agencies, therefore, working in concert with local officials and interested citizens, is to be wise stewards of the historic properties under their care or affected by their decisions. Agencies

are responsible for preserving the historic and design

significance of historic buildings and settings, even while extending their efficient life as far as possible into the future. Existing federal laws, programs, and policies provide a framework for the federal government's treatment of historic properties. Many federal sites have been recognized by listing in the National Register of Historic Places and are subject to protection under the National Historic Preservation Act.

Complex planning decisions must be made by federal and local planners as they, sometimes in partnership with private entities, pursue land acquisition and transfer, adaptive use of historic buildings, the expansion of federal facilities, and site and campus development. Current and future historic preservation challenges for federal agencies include:

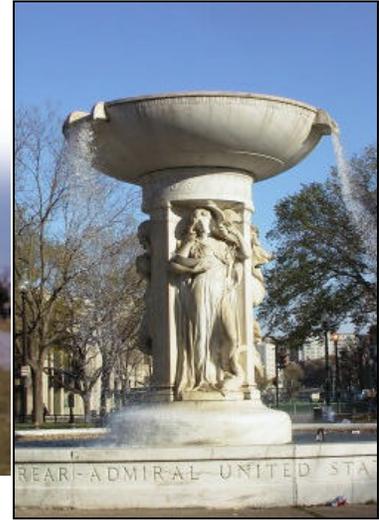
- Preserving the significant features and qualities of their historic properties through proactive maintenance of historic building fabric and designed landscape settings.
- Adapting historic properties for new and additional uses, by modernizing building systems and reallocating interior space while retaining significant interior architectural features such as lobbies, elevators, and public rooms and corridors.
- Responding to changes in visitation or use without affecting the historic significance of the property.
- Ensuring that historically significant parks and open space retain their integrity through the careful consideration of planning and design of potential facilities in historic landscapes and settings.
- Finding creative solutions to changing requirements such as the provision of security measures. The desire for increased security around federal facilities is a challenge to designers, historians, and security experts alike and is best addressed in a concerted manner that respects the historic features of each site.
- Protecting and strengthening historic urban design features such as the L'Enfant Plan. In the District of Columbia, any proposal to close a portion of a L'Enfant Plan street or to not conform to the right-of-way building line requires the closest scrutiny and consideration of alternatives.
- Protecting the character of the region's natural features, many of which have historical or cultural significance, such as the river shorelines, the ridge of the topographic bowl, agricultural land, parks, and designed landscapes, including areas planned for public access and enjoyment.
- Ensuring that new construction is responsive to the character of well-established built environments and reflects a commensurate level of design excellence.
- Collaborating with state and local governments in the protection and enrichment of the cultural and historic heritage of the region.



Agricultural Reserve,
Montgomery County, MD



Agricultural History Farm Park,
Montgomery County, MD



Dupont Circle Historic District

Historic Preservation Planning

The sustained engagement of citizens in the public process is fundamental to the broad acceptance of historic preservation and planning decisions by government agencies at all levels. The public dissemination of planning, historic preservation, and zoning information has resulted in a high general level of knowledge of, and interest in, federal and local decision-making. Federal agencies increasingly have considered local planning initiatives and goals in their design and planning, including historic preservation considerations. Factors such as the establishment of home rule in the District, county ordinances, revitalized local planning agencies, greater citizen interest and involvement, and landmark designations and zoning overlays all have contributed to fuller coordination among federal and local governments.

Federal agencies' master plans is a primary tool for assessing historic resources, developing long term goals and plans, coordinating with other public and private entities, and implementing new planning methods and technologies. NCPC reviews these master plans, verifying and participating in consultation with local preservation offices and providing an opportunity for public involvement. For installations with more complex historic preservation challenges, federal agencies may be asked to prepare management plans to provide in-depth procedures for the treatment of their historic properties.

The federal government has at its disposal many tools for the protection and enhancement of this legacy: laws, regulations, executive orders, federal planning and policy initiatives, the Federal Elements of the *Comprehensive Plan for the National Capital*, and individual agency policies. It has the obligation to coordinate with local and private entities and, when appropriate, to encourage partnerships with these entities. NCPC provides one of several public forums where planning and historic preservation consultation can occur. Finally, through the insistence on good new design and stewardship of its historic buildings and open space, the federal government is a primary advocate for, and protector of, the image and legacy of the nation's capital.

NCPC PROVIDES ONE OF SEVERAL FORUMS WHERE PLANNING AND HISTORIC PRESERVATION CONSULTATION CAN OCCUR.

NCPC is committed to supporting historic preservation, by law and through its policies, review process, and special studies. The Commission's *Extending the Legacy, Museums and Memorials Master Plan*, and the *National Capital Urban Design and Security Plan*, all accomplished with the contributions of other federal and District of Columbia agencies, provide a framework for historic preservation planning, now and in the future. The Commission continues to be a leader in the advocacy of coordinated urban and regional planning that accommodates the changing needs of the federal government while preserving the significant historic buildings and places that make the nation's capital the uniquely symbolic place it is.

Policies

NATIONAL CAPITAL IMAGE

Context

As the capital city, Washington represents the nation. The image of Washington is experienced by residents and visitors, and transmitted around the nation and world: by the media, the arts and literature, familiar historic photographs – even through our currency. This resonating and powerful image is formed in part by individual buildings and monuments, and in part by the overall urban design of the city – particularly because central Washington’s overall form has been explicitly, and very successfully, designed to create and convey a setting that symbolically expresses the nation.

This image evokes and reinforces our national aspirations, and is the backdrop to our nation’s

celebration, culture, and political life. Now that the federal establishment has grown beyond the original capital city to become a significant presence throughout the District of Columbia and beyond, the historic resources of the entire region have a role in shaping the image of the capital.

The following policies are intended to recognize and protect the overall character of the capital’s image, and improve it where needed. The guidance helps to ensure that future construction contributes to strengthening the significant architectural and planning character, achieved over centuries, that makes the national capital a special and unique place.

National Capital Image

Policies

The federal government should:

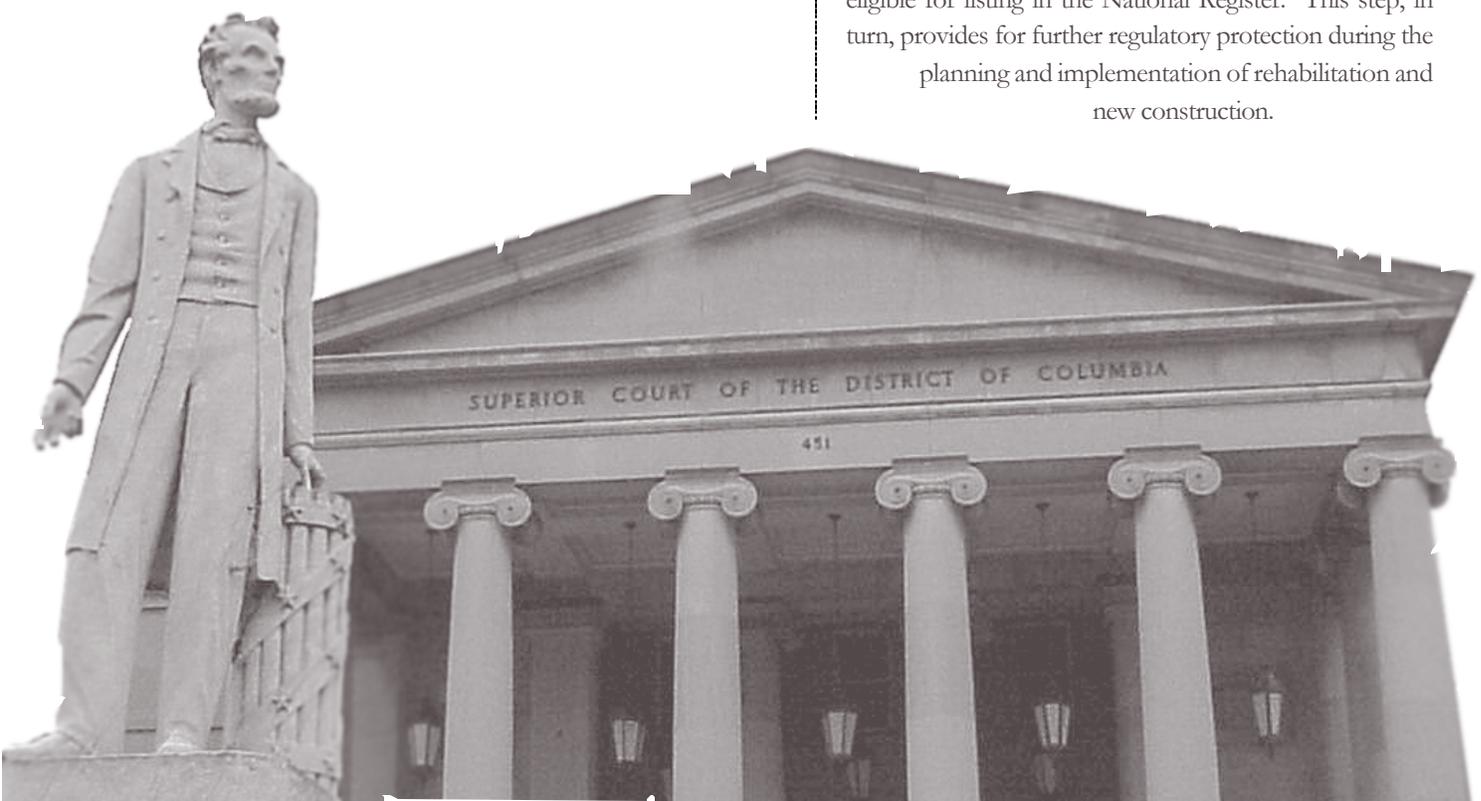
1. Express the dignity befitting the image of the federal government in the national capital. Federal development should adhere to the high aesthetic standards already established by the planning and design legacy of the nation’s capital. This legacy encompasses both the old and the new—the capital’s rich architectural heritage, continually augmented by the design contributions of each generation.
2. Plan carefully for appropriate uses and compatible design in and near the Monumental Core to reinforce and enhance its special role in the image of the nation’s capital.
3. Preserve the horizontal character of the national capital through enforcement of the 1910 Height of Buildings Act (36 Stat. 452; D.C. Code, sec. 5-401 et seq.).
4. Protect the skyline formed by the region’s natural features, particularly the topographic bowl around central Washington, as well as historically significant built features, from intrusions such as antenna towers, water towers, and rooftop equipment.
5. Protect and enhance the vistas and views, both natural and designed, that are an integral part of the national capital’s image.
6. Create transportation infrastructure that is consistent with the pedestrian character of the L’Enfant City and other historic settings. Bridges across the Potomac and Anacostia Rivers should be integrated with the design character of historic contexts. Highway structures should be removed and replaced with at-grade streets where possible.
7. Encourage the practice of good design principles throughout the region to continually strengthen the image of the nation’s capital.
8. Design exterior lighting to contribute to the capital’s nighttime image and suggest an appropriate hierarchy among the symbols and features of the nation’s capital.

STEWARDSHIP OF HISTORIC PROPERTIES

Context

The National Historic Preservation Act of 1966 (NHPA) established, as principle and law, the preservation of our nation's historical and cultural heritage. Sections 106 and 110 of NHPA provide the foundation for federal preservation policies, stewardship of historic properties, and decision-making. The National Park Service and the Advisory Council on Historic Preservation are the federal agencies charged with the management and oversight of National Historic Preservation Act programs. All federal agencies, however, no matter their mission, have an affirmative responsibility to identify and protect significant historic resources under their jurisdiction. They must take these resources into account when planning actions that might affect them, with the goal of avoiding the loss of their physical and historical integrity. The *Secretary of the Interior's Standards* are the benchmark by which federal agencies and others assess the effects of a proposed project on historic resources.

The National Register of Historic Places is the nation's inventory of significant historic properties. Federal agencies protect their historic resources by listing them in the National Register or by determining that they are eligible for listing in the National Register. This step, in turn, provides for further regulatory protection during the planning and implementation of rehabilitation and new construction.



Section 106 provides the framework for the regulatory process by which federal agencies reach decisions about historic properties under their jurisdiction. Historic preservation planning occurs during the design of individual projects, during the development of master plans, and, indeed, through federal agencies' efforts to research, evaluate, protect, and manage historical and cultural resources under their jurisdiction.

The Section 106 regulations establish the process by which federal agencies consider the effects of their proposed actions on historic properties. For many projects, Section 106 requires that federal agencies consult with the State Historic Preservation Offices of Maryland, the District of Columbia, or Virginia, involved Indian tribes, and the Advisory Council on Historic Preservation. Relevant federal and county or municipal agencies (including the Commission), interested professional, civic, and community organizations and individuals join public agencies in the consultation process.

Section 110 requires federal agencies to proactively identify, designate, and protect historic properties under their jurisdiction. Agencies such as the General Services Administration, the National Park Service, and the Department of Defense have large inventories of historic properties, entailing a significant commitment of resources in all aspects of property stewardship. Smaller agencies with limited land holdings, however, are also required to identify and protect their historic properties, even if property management is not central to their mission.

The National Capital Planning Commission has a significant and unique role in the National Capital Region. Under the terms of the Planning Act of 1952, NCPA reviews many of the projects undertaken by federal agencies and makes important decisions about the coordination of federal planning activities, many of which involve historic properties listed in or eligible for the National Register of Historic Places. The Commission also has an independent approval, or licensing, authority for

federal projects in the District of Columbia and for some District of Columbia government projects in the Central Area. The Commission's open public process and its unique planning perspective and role, underscored by the Comprehensive Plan and the Commission's other plans and policies, are the foundations of its decision-making.

For further information:

- National Capital Planning Commission
www.ncpc.gov
- Advisory Council on Historic Preservation
www.achp.gov
- National Park Service,
Heritage Preservation Services
www2.cr.nps.gov
- National Park Service,
National Register of Historic Places
www.cr.nps.gov/nr
- District of Columbia State Historic
Preservation Office
(D.C. Office of Planning)
www.planning.dc.gov
- Maryland State Historic
Preservation Office (Maryland Historical
Trust)
www.marylandhistoricaltrust.net
- Virginia State Historic Preservation Office
(Commonwealth of Virginia Department
of Historic Resources)
www.dhr.virginia.gov
- National Trust for Historic Preservation
www.nationaltrust.org



STEWARDSHIP OF HISTORIC PROPERTIES

Policies

The federal government should:

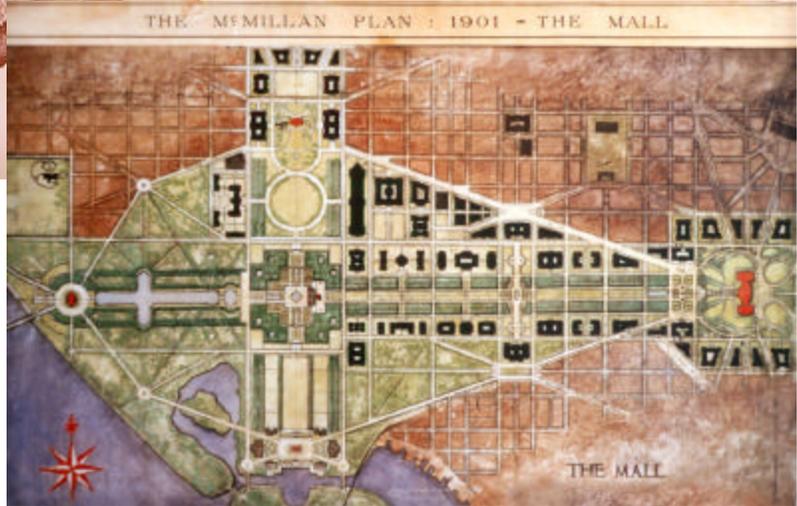
9. Sustain exemplary standards of historic property stewardship.
10. Identify and protect its historic properties and disseminate information about their significance to the public.
11. Support campus master planning and other planning initiatives as an opportunity to evaluate potential historic resources and to develop management plans for their protection and use.
12. Ensure that properties not yet listed in the *National Register of Historic Places* are nonetheless noted for their potential future significance and treated accordingly. Effort should be taken to identify and protect significant modernist architecture and landscapes, and properties that convey an evolving understanding of cultural significance.
13. Identify and protect both the significant historic design integrity and the use of historic landscapes and open space.
14. Protect the settings of historic properties, including views to and from the sites where significant, as integral parts of the historic character of the property.
15. Protect significant archaeological resources by leaving them intact, and maintain an inventory of sites with a potential for archaeological discovery.
16. Conduct archaeological investigations at the earliest phases of site or master planning phases in order to avoid the disturbance of archaeological resources.
17. Use historic properties for their original purpose or, if no longer feasible, for an adaptive use that is appropriate for the context and consistent with the significance and character of the property.
18. Ensure the continued preservation of federal historic properties through ongoing maintenance and transfer to an appropriate new steward when disposal of historic properties is appropriate.
19. Ensure that new construction is compatible with the qualities and character of historic buildings and their settings, in accordance with the Secretary of the Interior's *Standards for the Treatment of Historic Properties and Guidelines*.
20. Coordinate with local agencies, citizen groups, and property owners in the identification, designation, and protection of historic properties, public and private, since collectively these resources reflect the image and history of the National Capital Region.
21. Work cooperatively with local agencies to ensure that development adjacent to historic properties not detract from their historic character.
22. Recognize that historic federal properties are sometimes important for local history and ensure that locally significant characteristics or qualities are maintained.
23. Plan, where feasible, for federal historic properties to serve as catalysts for local economic development and tourism.



The L'Enfant Plan of 1791-92 is one of the world's greatest achievements in urban design.

The foundations of the historic plan of Washington are the L'Enfant and McMillan Plans.

The McMillan Plan of 1901-02 is the exemplar of urban planning from the era of The City Beautiful Movement.



THE HISTORIC PLAN OF WASHINGTON, D.C.

Context

The 1791-92 L'Enfant Plan for the capital city remains one of the world's great examples of urban design. The Plan's system of streets, open spaces, public buildings, and developable blocks has largely been maintained over the centuries, continually altered and yet largely underscored as the city's development has followed that seminal framework. The Senate Park Commission (the McMillan Commission) Plan of 1901-02 both altered and extended the L'Enfant Plan, resulting in the notable planning framework that we know today, especially (but not exclusive to) the Monumental Core. The DC State Historic Preservation Office and the National Park Service have recognized the significance of the Historic Plan of Washington, D.C. by protecting it through historic designation. Even as the metropolis and the federal government have spread throughout the region, the L'Enfant City remains the heart of the nation's capital and a priceless historical resource — providing the setting for the federal government as well as commercial enterprise and residential neighborhoods.

The Commission has a central role in the coordinated efforts of the federal government to protect the legacy of the L'Enfant Plan. The Commission conducted a special long-range planning study of the Monumental Core, published as *Extending the Legacy* in 1997. *Legacy* provides guidance for the protection of the Core's strengths, and for accommodating its future growth. The Commission's *Memorials and Museums Master Plan* of 2001, a plan developed in response to the *Legacy* vision, proposed policies to protect the historic open space on and near the National Mall. The Commission's *National Capital Urban Design and Security Plan* of 2002 established goals for the protection of buildings, settings, streetscapes, and associated open space through the coordinated design of security features where required.

The following policies address the special issues related to the protection of and ongoing changes to the historic plan of Washington, particularly within the Monumental Core and the L'Enfant City.

National Cathedral



THE HISTORIC PLAN OF WASHINGTON, D.C.

Policies

The federal government should:

24. Develop the Monumental Core in accordance with the principles of *Extending the Legacy* and the policies of the *Memorials and Museums Master Plan*. The National Mall's historic open space and monumental character should be respected and preserved for the benefit of future generations. New development should not infringe on the integrity of the National Mall and the surrounding Monumental Core, and should be excluded from the *Reserve* (in accordance with the Commemorative Works Act, as amended).

U.S. Naval Observatory



Sheridan Circle



Memorial to Mahatma Gandhi



Dupont Circle



Scott Circle

Mount Vernon Square
City Museum of Washington, DC

25. Promote continuity in the historic design framework of the nation's capital by protecting and enhancing the elements, views, and principles of the L'Enfant Plan. Both the federal and the District of Columbia governments should adhere to these principles in any improvements or alterations to the historic framework.
26. Preserve the historic street rights-of-way and reservations that contribute to the significant system of open space forming the urban design framework of the nation's capital.
27. Embellish L'Enfant reservations, avenues, and streets with monuments, fountains, and civic art placed to provide views and points of reference, in accordance with the Commemorative Works Act where applicable.

- 28. Protect the reservations that contain historic landscapes and features from incompatible changes or incursions.
- 29. Locate memorials, museums, and major federal facilities to support key design features of the L'Enfant Plan, including major streets and avenues, waterfronts, and scenic overlooks.
- 30. Protect views outward from the L'Enfant City and views inward from vantage points along the rim of the topographic bowl from inappropriate intrusions. Open space should be preserved to allow for public use and enjoyment of these views. (Examples include the west campus of St. Elizabeths Hospital and other parts of the Anacostia ridge, the Arlington ridge, and the escarpment north of Florida Avenue, NW.)
- 31. Protect and control the visual and functional qualities of L'Enfant rights-of-way.
- 32. Protect the open space of the L'Enfant streets. The exceptional width and openness of the street rights-of-way constitutes public space that helps to define the character of the city.
- 33. Protect the reciprocal views along the rights-of-way, as well as to and from squares, circles and reservations.
- 34. Protect the integrity, form, and design of the L'Enfant Plan's system of streets and reservations from inappropriate new buildings and physical incursions.



Union Station



Lincoln Park



Congressional Cemetery

Massachusetts Avenue, a L'Enfant avenue with later extensions, was designed with circles and squares along its length. These landscaped green spaces have been framed with prominent buildings and embellished with memorials and statues, which provide reciprocal views and vistas along the avenue.

35. Protect the historic importance and function of the streets as vehicular thoroughfares and avoid inappropriate traffic channelization that obscures the character of the right-of-way.
36. Construct building facades to the street right-of-way lines (building lines) to reinforce the spatial definition of the historic street plan.
37. Provide and maintain street trees to help frame axial views and reinforce the historic green character of the nation's capital.
38. Restore historic streets and reservations that have been inappropriately disrupted or closed to their original right-of-way or configuration at the earliest opportunity.
39. Take into account the historic spatial significance of the L'Enfant rights-of-way and reservations when designing and locating physical security measures along L'Enfant streets and reservations.
40. Protect and enhance the later extensions of major L'Enfant rights-of-way and associated reservations throughout the District of Columbia as part of the open space framework of the national capital.
41. Enhance and develop the boundary streets of the District of Columbia as defining features of Washington.
42. Preserve in place the extant boundary stones marking the original survey of the District of Columbia.
43. Protect the character of the historic parkways in the region through the careful planning of public and private development within their viewsheds.



Union Station's rehabilitation benefitted from historic preservation tax credits based on compliance with the Secretary's Standards.



The Secretary of the Interior's Standards

The Secretary of the Interior has established standards for historic preservation programs, including those advising federal agencies on the treatment of historic properties listed in, or eligible for listing in, the National Register of Historic Places. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings* have been developed to cover a wide range of preservation activities as well as types of historic properties. There are separate standards for *preservation, rehabilitation, restoration, and reconstruction*, as well as for *acquisition*. In addition, NPS has developed Guidelines to assist in applying the Standards to these different preservation standards and to different types of historic properties.

Federal agencies most commonly use *The Secretary of the Interior's Standards for Rehabilitation*, in conjunction with the *Guidelines for Rehabilitating Historic Buildings*, in carrying out their preservation responsibilities for properties in federal ownership or control, or for properties affected by federal projects. The Standards provide guidance for the preservation of a historic property's significance through the preservation of its historic materials and features. *Rehabilitation* assumes that some alteration of the historic building is required in order to make the building suitable for a current or new use. The National Park Service defines rehabilitation as "the act or process of making possible a compatible use for a property through repair, alteration, and additions while preserving those portions or features which convey its historical, cultural, or architectural values." The Standards and Guidelines provide guidance on how to achieve these alterations without the loss of historic building fabric and finishes that define the building's historic character.

The Secretary of the Interior's Standards for Rehabilitation:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archaeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.